



Ranjit S. Dhindsa

dir 202 898 5806

rdhindsa@hollingsworthllp.com

March 20, 2014

VIA ECF

Judge Pohorelsky  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: *Marinis v. Novartis Pharm. Corp.*, 1:06-cv-06162-JG-VVP

Judge Pohorelsky:

Following the status conference on March 6, 2014, the parties reached an agreement that eliminates the need for motion practice regarding the necessity of two additional fact witness non-party depositions. Specifically, the parties agreed to conduct the depositions of non-party witnesses, Meryl Soucie and Tracy Nadleman, only if it becomes evident during the deposition of Bill German that these individuals have information relevant to this action. Accordingly, defendant will not be filing a motion requesting any depositions today, March 20, 2014. All depositions will take place by May 31, 2014.

Respectfully submitted,

/s/ Eric Schwartz

Eric K. Schwarz, Esq.  
Sullivan Papain Block McGrath & Cannavo P.C.  
120 Broadway, 18th Floor  
New York, NY 10271  
(212) 732-9000

/s/ Ranjit Dhindsa

Ranjit S. Dhindsa, Esq.  
Hollingsworth LLP  
1350 I Street NW  
Washington, DC 20005  
(202) 898-5800

cc: David Richman, Esq.  
Wendell Y. Tong, Esq.